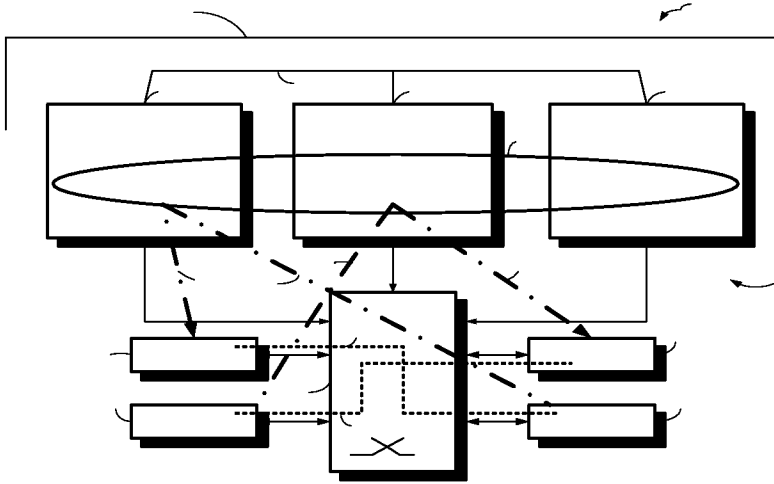
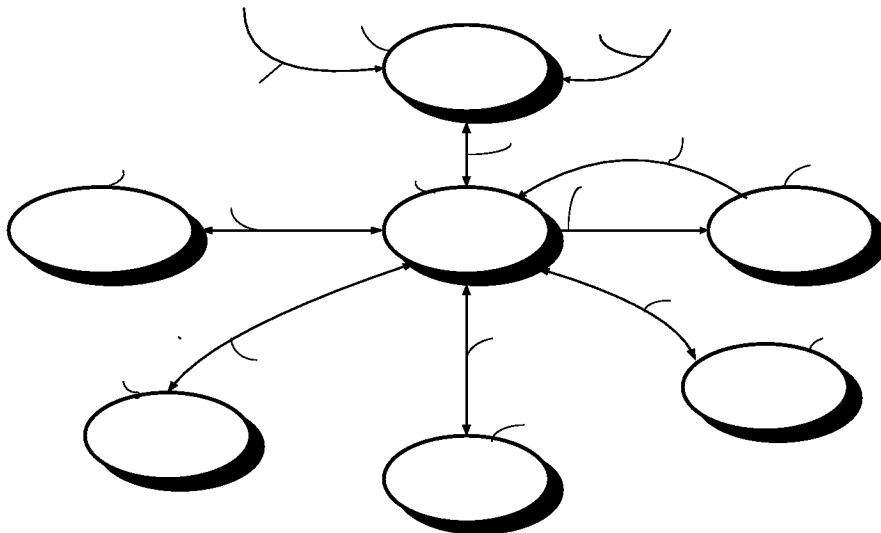


**REMARKS/ARGUMENTS**

Independent apparatus claim 81 and independent method claim 84 both recite a data communications network comprising a switch (22), plural user plane resources (24) connected to the switch, and connection handling functionality (26) which is distributed over a cluster of the plural processors. See Fig. 1 embedded below.



The connection handling functionality comprises software objects configured for setup or release of connections; with the software objects including a connection object (102) configured to activate a resource user plane control object (108) corresponding to a particular user plane resource involved in a bearer service connection.



32

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Claims 81-86, 73-75, 77-79, 1, 5, 7-9, 11-20, 22-27, 36-40, 42-44, 46-55 and 57-62 stand rejected under 35 USC §103(a) as being anticipated by U.S. Patent 6,891,833 to Caves et al in view of U.S. Patent 5,179,633 to Barabash et al (see enumerated paragraph 3 of the Office Action).

All prior art rejections are respectfully traversed for at least the following reasons.

Independent apparatus claim 81 and independent method claim 84 both recite a connection handling functionality over the cluster of the plural processors. The connection handling functionality comprises software objects configured for setup or release of connections; with the software objects including a connection object configured to activate a resource user plane control object corresponding to a particular user plane resource involved in a bearer service connection.

The office action properly admits that Caves does not disclose “software objects”, but apparently believes that mere mention of “object-oriented programming” in col. 6 of Barabash would make it obvious to use the supposed software objects of Barabash into the AAL2 server or other elements of Caves.

Applicants believe that the office action has improperly presumed that Barabash has or uses objects. Barabash is not an object-oriented system, but only makes oblique reference (in a col. 6 background discussion) to object-oriented systems as a contrast to the “reticular” discrimination network (RETE-net) of Barabash. Barabash’s main focus in col. 6 of Barabash’s background is procedural attachment programming for use with a “reticular” discrimination network (RETE-net). Barabash merely points out that procedural attachment techniques cannot be used with RETE-net like with object-oriented systems. Barabash mentions that RETE-net is similar to object-oriented system in the exchange of tokens, but does not indicate similarity in any other way.

In reality, Barabash does not mentions “object” with reference to its own operation. In fact, there is no mention of “objects” at all in Barabash’s detailed description. Moreover, it seems from col. 5, lines 54+, that RETE-nets are totally distinct from object-oriented systems and must be interfaced with them.

Barabash does not provide any insight or teaching relative to the structure of software for a node of a multi-processor (cluster) data communications network which sets up or handles connection. Barabash is concerned with “artificial intelligence”, and thus does not provide any insight into how object-oriented programming (which Barabash does not itself use) would be used in a telephony environment.

In view of the foregoing and other considerations, all claims are deemed in condition for allowance. A formal indication of allowability is earnestly solicited.

The Commissioner is authorized to charge the undersigned's deposit account #14-1140 in whatever amount is necessary for entry of these papers and the continued pendency of the captioned application.

Should the Examiner feel that an interview with the undersigned would facilitate allowance of this application, the Examiner is encouraged to contact the undersigned.

Respectfully submitted,

**NIXON & VANDERHYTE P.C.**

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